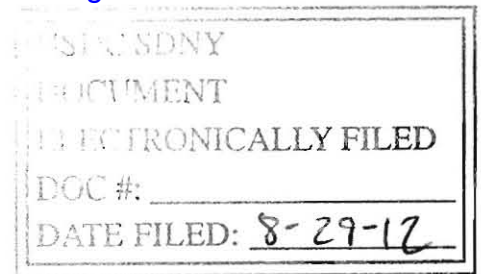


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 Edward H. Glenn, Jr.  
 Kevin D. Galbraith  
 August M. Iorio



August 28, 2012

**HAND DELIVERED**

Honorable Paul A. Crotty  
 United States District Judge  
 United States District Court – SDNY  
 500 Pearl Street  
 New York, NY 10007

*8/29/12*  
*The complaint, indictment and arrest warrant in US v. Balboa 12 CRIM 196 (PAC) are not sealed, and are part of the public file (see Docket 3 in 12 CR 196). Plaintiff is directed to file a redacted version for ECF and on worldaccess copy to be filed under seal. No order!*

**Re: Marylebone PCC Limited – Rose 2 Fund, et al.  
 v. Millennium Global Investments LTD., et al.  
 Civil Action No. 12-CV-3835 (PAC) (SDNY)  
 REQUEST TO FILE COMPLAINT UNDER SEAL**

*Paul M. M...  
 OSDF*

Dear Judge Crotty:

I represent the plaintiff in the above-captioned proposed class action. Pursuant to the Southern District of New York's Sealed Records Filing Instructions, I request permission to file our forthcoming First Amended Class Action Complaint under seal.

Pursuant to a stipulation among the parties and approved by this court, see D.I. 24, the Plaintiff anticipates filing an amended complaint this Friday, August 31, 2012. In addition to adding new parties and counts, we anticipate adding significant detail which one or more Defendants may consider confidential. In particular:

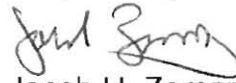
1. We anticipate adding substantial detail alleged under oath in the Sealed Complaint filed in related criminal case *United States v. Balboa*, 11-MAG-3038 (SDNY) (PAC). We obtained a publicly available copy of the criminal complaint from the website maintained by KPMG Advisory Limited in Bermuda ("KPMG") on behalf of the Millennium Global Emerging Credit Fund, currently in liquidation. However, the complaint appears to remain under seal in this Court.
2. We anticipate adding new facts obtained from purportedly confidential documents provided to investors by one or more Defendants.
3. We anticipate adding new facts obtained from investor updates provided by KPMG which KPMG has asked be kept confidential.

MEMO ENDORSED

Hon. Paul A. Crotty, USDJ  
August 28, 2012  
Page 2

We anticipate that one or more Defendants may wish to keep some of the newly added facts confidential. I therefore propose 1) to file Friday's complaint under seal, 2) to provide a PDF copy via email to counsel for Defendants, and 3) to give counsel time to review and present arguments to Your Honor for keeping the complaint under seal and/or proposing redactions.

Respectfully Submitted,



Jacob H. Zamansky  
Counsel for Plaintiff and Proposed  
Interim Co-Lead Counsel

JHZ:ias  
Enclosures

cc: All Parties